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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

REBECCA MASON,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 3:22-cv-00247-SLG
	)	
UNIVERSITY OF ALASKA-	)	
ANCHORAGE through the Board of	)	
Regents; et al.,	)	AFFIDAVIT OF
	)	<u>PAMELA D. WEISS</u>
Defendants.	)	
_____	)	
STATE OF ALASKA	)	
	)	ss.
THIRD JUDICIAL DISTRICT	)	

I, PAMELA D. WEISS, being first duly sworn, depose and state as follows:

1. I am an attorney with Guess & Rudd P.C., attorneys for the University of Alaska, and individually named UAA defendants (collectively, "UAA Defendants") in this matter. I have personal knowledge of the matters set forth herein.

2. I have personally reviewed the billing records of Guess & Rudd P.C. in this action and make these statements based on my personal knowledge.


3. I became a member of the Alaska Bar in 2003 and have practiced continuously in Alaska since that time. I have represented individuals, businesses and government agencies in a variety of civil litigation matters.

4. The \$300 hourly rate charged to UAA Defendants in this case is reasonable and consistent with the prevailing rate charged by attorneys in the community. I am aware of attorneys who charge much higher rates per hour and that U.S. District Court has previously found that a rate of \$300/hour is reasonable. A small amount of work performed by an associate was billed at an even lower rate, of \$225/hour.

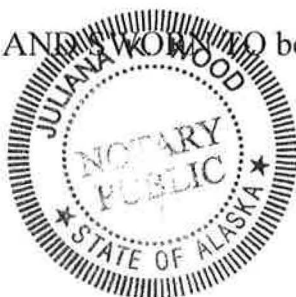
5. Attached hereto as Exhibit A are the billing records, which show that our firm performed at least 224.10 hours of work on this matter and therefore the actual fees incurred by UAA Defendants in connection with defense of this matter are \$67,566.30. Information reflecting attorney-client privilege communications or work product has been redacted.

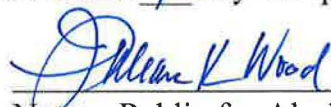
6. The fees reflected in the billing records were actually, necessarily, and reasonably incurred by UAA Defendants in the defense of both the federal and state law claims brought by Ms. Mason.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
Pamela D. Weiss

SUBSCRIBED AND SWORN to before me this 7<sup>th</sup> day of April, 2025.



  
Notary Public for Alaska  
My commission expires: 3/20/2028

## Guess & Rudd P.C.

### Inquiry Activity Billed Report (Inception-to-Date)

Client/Matter: 06793 UNIVERSITY OF ALASKA / 06793.0005 Rebecca Mason v. University of Alaska, et al

Bill Attorney: PDW Pamela Weiss

	<u>Hours</u>	<u>Fees</u>	<u>Cash Exp.</u>	<u>Non-Cash Exp.</u>	<u>Discount</u>	<u>Total</u>
Billed:	224.10	67,215.00	351.30	0.00	0.00	67,566.30
<hr/>						
<u>Employee Recap:</u>	<u>Hours</u>	<u>Fees</u>	<u>Cash Exp.</u>	<u>Non-Cash Exp.</u>	<u>Discount</u>	<u>Total</u>
CR Rankin, Christina	13.50	4,050.00	0.00	0.00	0.00	4,050.00
KEC Kristin E. Crabb	0.60	195.00	0.00	0.00	0.00	195.00
PDW Pamela Weiss	209.60	62,880.00	351.30	0.00	0.00	63,231.30
RBR Burns-Riley, Rikki	0.40	90.00	0.00	0.00	0.00	90.00

<u>Date</u>	<u>Tkpr/Exp</u>	<u>Activity Description</u>	<u>Billed Values</u>		
			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
Time Fees					
11/30/2022	CR Rankin, Christina		0.60	300.00	180.00
		Emails to/from client contacts re new assignment; review complaint and proposed waiver of summons			
12/14/2022	CR Rankin, Christina		1.20	300.00	360.00
		Review waiver of process issues; draft letter to opposing counsel re same; emails to/from client contact re same/status/plan			
01/10/2023	CR Rankin, Christina		0.40	300.00	120.00
		Emails/calls to/from client contact re answer, [REDACTED] next steps, etc.			
01/26/2023	RBR Burns-Riley, Rikki		0.30	225.00	67.50
		Email to Christina Rankin regarding Answer			
02/03/2023	CR Rankin, Christina		0.30	300.00	90.00
		Emails to/from client contact re [REDACTED]			
02/07/2023	CR Rankin, Christina		0.20	300.00	60.00
		Emails to/from opposing counsel/client contact re [REDACTED]			
02/10/2023	CR Rankin, Christina		3.30	300.00	990.00
		Work on Answer to Complaint			
02/13/2023	CR Rankin, Christina		2.90	300.00	870.00
		Continue to revise and supplement lengthy Answer, including adding affirmative defenses; emails to/from client contact re [REDACTED]			
02/17/2023	CR Rankin, Christina		0.10	300.00	30.00
		Call with client re status, plan			
02/24/2023	CR Rankin, Christina		0.20	300.00	60.00
		Emails to/from client contact re [REDACTED]			
02/27/2023	CR Rankin, Christina		0.40	300.00	120.00
		Emails/calls to/from client contact re [REDACTED]; email opposing counsel re service			
02/28/2023	CR Rankin, Christina		0.80	300.00	240.00
		Emails to/from opposing counsel/client contact re service; draft letters/memo re [REDACTED]			
03/07/2023	CR Rankin, Christina		0.50	300.00	150.00
		Emails to/from client contact, individual clients re [REDACTED] (.3); work on strategy re Answer for individual defendants (.2)			
03/07/2023	PDW Pamela Weiss		3.50	300.00	1,050.00
		Review file (.2); revise and supplement Answer (3.3)			
03/08/2023	CR Rankin, Christina		1.80	300.00	540.00
		Revise, supplement, and forward draft Answers to individual defendants; email client contact re same			
03/08/2023	PDW Pamela Weiss		1.40	300.00	420.00
		Review file/Complaint (.3); review client documents (.7) supplement Answer (.4)			
03/09/2023	CR Rankin, Christina		0.30	300.00	90.00
		Emails to/from C. Michel re [REDACTED]			
03/09/2023	PDW Pamela Weiss		0.90	300.00	270.00
		Revise and supplement Answer [REDACTED] (.7); research [REDACTED] (.2)			

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			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
03/13/2023	PDW Pamela Weiss	Review Order re initial planning and scheduling conference report	0.10	300.00	30.00
03/22/2023	CR Rankin, Christina	Call with opposing counsel re parties planning meeting	0.50	300.00	150.00
03/29/2023	RBR Burns-Riley, Rikki	Check on status of completion of scheduling and planning report	0.10	225.00	22.50
03/30/2023	PDW Pamela Weiss	Review joint parties planning report (.1); email counsel re same (.2); additional email to counsel re parties report (.2)	0.50	300.00	150.00
04/10/2023	PDW Pamela Weiss	Draft email to M. Kenna [REDACTED]	0.10	300.00	30.00
04/14/2023	PDW Pamela Weiss	Teleconference with M. Kenna [REDACTED] review email to defendant Kinley re [REDACTED]	0.10	300.00	30.00
04/17/2023	PDW Pamela Weiss	Email correspondence from/to D. Kinley re [REDACTED]	0.10	300.00	30.00
04/20/2023	PDW Pamela Weiss	Email to/from Dorothy Kinley re [REDACTED] (.1); research re federal claims under due process, ADA, Rehabilitation Act in lengthy [REDACTED] (3.6); research re state law claim for NIED [REDACTED] (.4); research re UAA academic integrity process (.3)	4.40	300.00	1,320.00
04/21/2023	PDW Pamela Weiss	Teleconference with Daisy Saffir (.2); review deadlines (.1); research re NIED, IIED and contract claims (.7)	1.00	300.00	300.00
04/24/2023	PDW Pamela Weiss	Revise and supplement preliminary Witness List (.1); review and supplement Initial Disclosures (.2); identify items needed for disclosures and draft and send email to M. Kenna re [REDACTED] (.3)	0.60	300.00	180.00
04/25/2023	PDW Pamela Weiss	Correspondence to/from M. Kenna re documents and disclosures (.2); draft and send email to attorney Altman re extension (.1)	0.30	300.00	90.00
04/27/2023	PDW Pamela Weiss	Call to attorney Altman (.1); email to/from Altman re extension of deadlines (.2)	0.30	300.00	90.00
04/28/2023	PDW Pamela Weiss	Review and finalize Motion for Unopposed Extension and Proposed Order re same	0.10	300.00	30.00
05/03/2023	PDW Pamela Weiss	Emails to/from Altman re meeting and extensions	0.20	300.00	60.00
05/10/2023	PDW Pamela Weiss	Identify subjects for discovery requests	0.20	300.00	60.00
05/12/2023	PDW Pamela Weiss	Email to M. Kenna re [REDACTED]	0.10	300.00	30.00
05/16/2023	PDW Pamela Weiss	Email correspondence to/from M. Kenna re [REDACTED]	0.10	300.00	30.00
05/17/2023	PDW Pamela Weiss	E-mail communication with M. Kenna re [REDACTED]	0.10	300.00	30.00

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			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
05/19/2023	PDW Pamela Weiss	Begin review and analysis of file materials	0.80	300.00	240.00
05/22/2023	PDW Pamela Weiss	Continue review and analyze records [REDACTED]	1.80	300.00	540.00
05/22/2023	PDW Pamela Weiss	Evaluate elements of contract claim	0.20	300.00	60.00
05/24/2023	PDW Pamela Weiss	Research re FERPA with respect to materials for Initial Disclosures (.9); identify items for redaction in Initial Disclosures (.9)	1.80	300.00	540.00
05/25/2023	PDW Pamela Weiss	Evaluate [REDACTED] (.2); correspondence with M. Kenna re [REDACTED] (.2)	0.40	300.00	120.00
05/26/2023	PDW Pamela Weiss	Evaluate [REDACTED]	0.00	0.00	0.00
05/30/2023	PDW Pamela Weiss	Revise and supplement Initial Disclosure pleading (.3); review and identify privileged information in materials to accompany initial disclosures and analyze [REDACTED] (1.3)	1.60	300.00	480.00
05/31/2023	PDW Pamela Weiss	Receive and review Initial Disclosures from Mason	0.10	300.00	30.00
06/06/2023	PDW Pamela Weiss	Evaluate basis for Mason contract claim (.2); begin working on discovery requests to Mason (.3)	0.50	300.00	150.00
06/07/2023	PDW Pamela Weiss	Identify subjects for discovery requests and work on drafting first set of RFAs	2.80	300.00	840.00
06/08/2023	PDW Pamela Weiss	Revise and supplement discovery requests to plaintiff	1.50	300.00	450.00
06/16/2023	PDW Pamela Weiss	Revise and supplement proposed discovery requests to Mason (.2); draft and send email to M. Kenna and Patti re same (.1)	0.30	300.00	90.00
06/26/2023	PDW Pamela Weiss	Draft and send additional email to M. Kenna and Patti re discovery requests	0.10	300.00	30.00
07/11/2023	PDW Pamela Weiss	Correspondence with Patti re [REDACTED]	0.10	300.00	30.00
07/17/2023	PDW Pamela Weiss	Review and analyze discovery requests to UAA, Mufale and Michel (.4); draft and send email to M. Kenna and Patti re [REDACTED] (.2); draft and send email to defendant Michel re [REDACTED] (.2); draft and send email to defendant Mufale re [REDACTED] responses (.1)	0.90	300.00	270.00
07/17/2023	PDW Pamela Weiss	Email correspondence f/t defendant Michel re [REDACTED]	0.10	300.00	30.00
07/18/2023	PDW Pamela Weiss	Additional email correspondence from/to defendant Michel re [REDACTED] (.1); email correspondence from/to defendant Mufale re [REDACTED] (.1)	0.20	300.00	60.00

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			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
07/19/2023	PDW Pamela Weiss	Additional email correspondence from/to B. Mufale re [REDACTED] (.2); email correspondence from/to M. Kenna re [REDACTED] (.2)	0.40	300.00	120.00
07/24/2023	PDW Pamela Weiss	Prepare for meeting with defendant Michel (.3); teleconference with Michel re [REDACTED] (2.3); receive and review Michel's CV (.1)	2.70	300.00	810.00
07/25/2023	PDW Pamela Weiss	Prepare for telephone discussion with B. Mufale (.3); phone call with B. Mufale [REDACTED] (1.2); draft and send follow up email to B. Mufale re [REDACTED] (.1)	1.60	300.00	480.00
07/26/2023	PDW Pamela Weiss	Draft responses to interrogatories for Mufale (1.3); begin drafting responses to interrogatories for Michel (.4)	1.70	300.00	510.00
07/31/2023	PDW Pamela Weiss	Telephone discussion with Mike re discovery responses	0.20	300.00	60.00
08/03/2023	PDW Pamela Weiss	Draft and send email to B. Mufale re [REDACTED] (.1); supplement answer to Mufale's interrogatories (.2)	0.30	300.00	90.00
08/14/2023	PDW Pamela Weiss	Draft and send email to attorney Altman re extension for discovery responses (.1); review and analyze [REDACTED] (.2); email to M. Kenna re [REDACTED] (.1)	0.40	300.00	120.00
08/15/2023	PDW Pamela Weiss	Review and analyze Mason discovery responses [REDACTED] (1.3); continue drafting answers to Interrogatories from defendant Michel (1.0)	2.30	300.00	690.00
08/16/2023	PDW Pamela Weiss	Phone call to/from Banu Mufale re discovery responses (.1); review and analyze [REDACTED] (.1); draft responses to RFAs for defendant Michel (.8); revise and supplement responses to Interrogatories for defendant Mufale (.4); analyze discovery requests to UAA [REDACTED] (.7)	2.10	300.00	630.00
08/18/2023	PDW Pamela Weiss	Email to/from M. Kenna re [REDACTED] (.1); review and analyze provisions [REDACTED] (1.1); begin drafting objections to discovery requests to UAA (.4)	1.60	300.00	480.00
08/22/2023	PDW Pamela Weiss	Telephone communication with M. Kenna re [REDACTED] (.2); work on draft UAA responses (1.4)	1.60	300.00	480.00
08/23/2023	PDW Pamela Weiss	Receive and review and respond to multiple emails from C. Michel re [REDACTED] (.3); phone call with P. Wilson re [REDACTED] (.1); revise and supplement responses to interrogatories for Mufale (.3); evaluate and draft responses to RFAs for Mufale (.7); revise and supplement responses for Michel (.5); draft objections and responses for UAA responses to Interrogatories (2.6)	4.50	300.00	1,350.00



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			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
08/24/2023	PDW Pamela Weiss	Draft and send email to Mufale and Michel re discovery responses (.2); draft objections and responses for UAA to Requests for Admission and Requests for Production (1.6); revise and supplement responses to Interrogatories (.3); outline letter to Altman re plaintiff's discovery responses (.4); begin drafting letter to Altman re plaintiff's discovery responses (.7); email to/from M. Kenna re [REDACTED] (.1); additional email correspondence to/from Michel re discovery responses and revise responses based on discussion (.5); phone call with Mufale re [REDACTED] (.6); phone call with P. Wilson re [REDACTED] (.8)	5.20	300.00	1,560.00
08/25/2023	PDW Pamela Weiss	Email correspondence with P. Wilson re [REDACTED]	0.20	300.00	60.00
08/28/2023	PDW Pamela Weiss	Multiple telephone calls and emails with Dean Morton re [REDACTED] (.8); review and revise UAA discovery responses [REDACTED] (.6); develop plan [REDACTED] (.1); draft and send emails to Mufale and Michel re [REDACTED] (.2); compose and send email to Mike and Patti re [REDACTED] (.2)	1.90	300.00	570.00
08/30/2023	PDW Pamela Weiss	Emails f/t Mufale re verification page (.1); telephone discussion with Dean Morton [REDACTED] (.2)	0.30	300.00	90.00
09/06/2023	PDW Pamela Weiss	Phone calls to/from P. Wilson re [REDACTED]	0.30	300.00	90.00
09/08/2023	PDW Pamela Weiss	Emails from/to Dean Morton re [REDACTED]	0.20	300.00	60.00
09/12/2023	PDW Pamela Weiss	Telephone call to Altman re discussion of settlement	0.10	300.00	30.00
09/13/2023	PDW Pamela Weiss	Phone call with plaintiff attorney Altman re remedies sought by plaintiff (.5); analyze offer and draft and send email to Mike and Patti re [REDACTED] (.6)	1.10	300.00	330.00
09/19/2023	PDW Pamela Weiss	Compose and send email to Patti and Mike re [REDACTED] (.1); multiple correspondence to/from Mike re [REDACTED] (.2); compose and send responsive email to Mike [REDACTED] (.3); begin drafting proposed email to K Altman re counter offer (.1); research and analyze [REDACTED] (.3); revise and supplement R 37 letter re discovery responses (.8); telephone discussion with Patti re [REDACTED] (.6)	2.40	300.00	720.00
09/20/2023	PDW Pamela Weiss	Review and revise email to Altman re counter-offer (.1); evaluate pretrial and discovery tasks to [REDACTED] (.2); revise and supplement letter to Altman re deficient discovery responses (.3)	0.60	300.00	180.00
09/21/2023	PDW Pamela Weiss	Revise and supplement letter to Altman (.2); draft and send email to P. Wilson and M. Kenna re [REDACTED] (.1)	0.30	300.00	90.00
09/27/2023	PDW Pamela Weiss	Correspondence from/to Altman re extension for supplemental discovery responses	0.10	300.00	30.00
10/13/2023	PDW Pamela Weiss	Review and analyze supplemental discovery responses to determine compliance with R 37 letter and court rules (.5); draft and send email to clients re [REDACTED] (.1)	0.60	300.00	180.00
10/16/2023	PDW Pamela Weiss	Review and analyze response to discovery request re medical records and draft and send email to P. Wilson re [REDACTED]	0.20	300.00	60.00



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			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
10/19/2023	PDW Pamela Weiss	Review and analyze discovery responses and evaluate information [REDACTED] [REDACTED]	2.50	300.00	750.00
10/20/2023	PDW Pamela Weiss	Begin drafting second set of discovery requests	0.50	300.00	150.00
10/23/2023	PDW Pamela Weiss	Review and analyze supplemental disclosures and supplement and draft RFAs to Mason (1.5); forward to client for review (.1)	1.60	300.00	480.00
10/25/2023	PDW Pamela Weiss	Draft and send responsive email to K. Altman re depositions (.2); draft and send emails to UAA re [REDACTED] (.2); draft and send separate emails to individual defendants re [REDACTED] (.2); telephone call and discussion with Dr. Michel re [REDACTED] (.6)	1.20	300.00	360.00
10/26/2023	PDW Pamela Weiss	Review and analyze email from Altman re deposition scheduling and extension of pretrial deadlines (.1); review and analyze schedule and draft and send email to Altman re same (.3); review and revise second discovery requests (.1)	0.50	300.00	150.00
10/27/2023	PDW Pamela Weiss	Draft response to Altman re deposition scheduling and extension (.2); draft and send email to UAA and individual defendants re [REDACTED] (.3)	0.50	300.00	150.00
10/31/2023	PDW Pamela Weiss	Review and analyze proposed joint motion for extension of pretrial deadlines (.2); draft and send email to plaintiff counsel re alternative proposal (.2)	0.40	300.00	120.00
11/01/2023	KEC Kristin E. Crabb	Review and analyze 30(b)(6) request objections	0.30	350.00	105.00
11/01/2023	PDW Pamela Weiss	Review and analyze subjects in draft 30b6 notice (.2); research [REDACTED] (.3); review and analyze proposed amended joint motion to extend deadlines and email to plaintiff approving same (.2)	0.70	300.00	210.00
11/03/2023	PDW Pamela Weiss	Draft and send email update to P. Wilson re [REDACTED] (.1); additional review and analysis of 30b6 notice (.2)	0.30	300.00	90.00
11/08/2023	PDW Pamela Weiss	Draft and send emails to individual defendants re [REDACTED] (.1); draft and send email to Altman re 30(b)(6) notice deficiency (1.4); correspondence from/to Altman re 30(b)(6) notice scope (.3)	1.80	300.00	540.00
11/09/2023	PDW Pamela Weiss	Email correspondence to/from B. Mufale re [REDACTED] (.2); draft and send email to C. Michel re [REDACTED] (.1)	0.30	300.00	90.00
11/10/2023	PDW Pamela Weiss	Draft and send email to Altman re depositions of Mufale and Michel	0.10	300.00	30.00
11/14/2023	PDW Pamela Weiss	Prepare for teleconference with Altman re 30b6 (.2); teleconference with Altman re 30b6 notice deficiencies (.5)	0.70	300.00	210.00
11/20/2023	PDW Pamela Weiss	Email from and draft responsive email to Altman re extension for discovery responses	0.10	300.00	30.00

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12/04/2023	PDW Pamela Weiss	Receive, review and analyze second discovery responses and supplemental IDs (.4); review and analyze renote of 30b6 deposition (.2); draft and send email to P. Wilson and M. Kenna re [REDACTED] (.1); draft and send email to P. Wilson and M. Kenna re [REDACTED] (1)	0.80	300.00	240.00
12/08/2023	PDW Pamela Weiss	Email correspondence from/to Altman re 30b6 deposition (.2); email correspondence to/from Dean Morton re [REDACTED] (.2); draft and send email to Patti and Mike re [REDACTED] (.1)	0.50	300.00	150.00
12/09/2023	PDW Pamela Weiss	Correspondence from/to Dean Morton re [REDACTED]	0.10	300.00	30.00
12/11/2023	PDW Pamela Weiss	Email correspondence with Dean Morton and P. Wilson re [REDACTED]	0.20	300.00	60.00
12/13/2023	PDW Pamela Weiss	Identify additional individuals to include on Final Witness List (.5); draft final discovery witness list (.3)	0.80	300.00	240.00
12/14/2023	PDW Pamela Weiss	Multiple email correspondence to/from Altman re depositions (.4); draft and send follow up email to D. Kinley (.1)	0.50	300.00	150.00
12/15/2023	PDW Pamela Weiss	Teams meeting with P. Wilson and Dean Morton re [REDACTED] (.8); identify disclosure materials and forward to Dean Morton [REDACTED] (.3); draft summaries for Final Discovery Witness List (.5); email to P. Wilson and M. Kenna re [REDACTED] (.1); draft email to Altman re 30b6 witnesses for deposition (.1); correspondence with P. Wilson re [REDACTED] (.1); phone call to D. Kinley (.1)	2.00	300.00	600.00
12/18/2023	PDW Pamela Weiss	Review and analyze plaintiff's Final Witness List (.1); email correspondence to/from P. Wilson re [REDACTED] (.1); email and phone call to C. Hagen (.1); review and revise UAA Final Witness List (.2)	0.50	300.00	150.00
12/19/2023	PDW Pamela Weiss	Supplement and send email to Altman re depositions (.2); telephone discussion with Dr. Carla Hagen re [REDACTED] (.8); draft and send email to Dr. Hagen [REDACTED] (.2); additional email correspondence to/from Altman re deposition scheduling (.1)	1.30	300.00	390.00
12/20/2023	PDW Pamela Weiss	Multiple email correspondence to/from Altman re depositions (.3); draft and send email to B. Mufale and C. Michel re [REDACTED] (.1); draft and send email to P. Wilson and M. Kenna re [REDACTED] (.1); draft and send email [REDACTED] to Hagen and Morton (.1); correspondence from/to Michel re [REDACTED] (.2)	0.80	300.00	240.00
01/12/2024	PDW Pamela Weiss	Draft and send email to D. Kinley	0.10	300.00	30.00
01/16/2024	PDW Pamela Weiss	Phone call with D. Kinley re [REDACTED] (.6); draft and send email to Altman re deposition of Kinley (.1); preparation for deposition of Mason (.5); review and analyze Expert disclosure filed by plaintiff and evaluate [REDACTED] (.3)	1.50	300.00	450.00
01/17/2024	PDW Pamela Weiss	Multiple correspondence to/from Altman re Kinley deposition (.3); phone call with Kinley re [REDACTED] (.1); analyze claims and discovery to date [REDACTED] (1.7); draft email to P. Wilson and M. Kenna re [REDACTED] (.1)	2.20	300.00	660.00

<u>Date</u>	<u>Tkpr/Exp</u>	<u>Activity Description</u>	<u>Billed Values</u>		
			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
01/18/2024	PDW Pamela Weiss	Multiple email correspondence to/from Altman re depositions and notices (.2); draft and send emails to individual defendants re [REDACTED] (.1); correspondence to/from defendant Mufale re change to deposition date (.1); email correspondence to/from Altman re same (.2); review records for use in deposition of Mason (1.7)	2.30	300.00	690.00
01/19/2024	PDW Pamela Weiss	Email correspondence with Altman re deposition (.1); email correspondence with Dr. Michel re [REDACTED] (.2); email correspondence with Dean Morton re [REDACTED] (.1); research re contract and ADA claims (1.4); receive and review multiple Notices of Deposition [REDACTED] (.1)	1.90	300.00	570.00
01/22/2024	PDW Pamela Weiss	Work on outline for deposition of Mason (4.2); correspondence with Dean Morton re [REDACTED] (.3); email to Director Hagan re [REDACTED] (.1)	4.60	300.00	1,380.00
01/24/2024	PDW Pamela Weiss	Continue work on outline for deposition of Mason (2.4); email correspondence with Carla Hagen re [REDACTED] (.2)	2.60	300.00	780.00
01/25/2024	PDW Pamela Weiss	Correspondence with Patti re [REDACTED] (.1); email correspondence from/to Altman re depositions (.1); email correspondence with Carla Hagen re [REDACTED] (.2); email correspondence with Daisy (.1); analyze deadlines for case planning (.2)	0.70	300.00	210.00
01/26/2024	PDW Pamela Weiss	Revise and supplement Mason deposition outline (2.1); analyze and identify exhibits for use in deposition (.9); Zoom meeting with Carla Hagen re [REDACTED] (1.3)	4.30	300.00	1,290.00
01/29/2024	PDW Pamela Weiss	Analyze and organize exhibits for use in deposition of Rebecca Mason	1.10	300.00	330.00
01/30/2024	PDW Pamela Weiss	Correspondence to/from Altman re plan for deposition (.1); conduct deposition of Rebecca Mason (5.6); identify exhibits to forward to court reporter following deposition (.2); draft and send summary of deposition to Daisy (1.4)	7.30	300.00	2,190.00
02/01/2024	PDW Pamela Weiss	Review and analyze documents in preparation for meeting with Dean Morton (.5); zoom meeting with Dean Morton to prepare for deposition (2.1); draft email to Dean Morton re [REDACTED] (.1); phone call with Director Carla Hagen re [REDACTED] (1.7)	4.40	300.00	1,320.00
02/02/2024	PDW Pamela Weiss	Prepare for meeting with Hagen (.2); travel to UAA to meet with Hagen (.4) meeting with Hagen re [REDACTED] (2.0)	2.60	300.00	780.00
02/05/2024	PDW Pamela Weiss	Receive and review information re zoom deposition and draft and send email to Dean Morton re same (.1); review and analyze documents provided by Director Hagen [REDACTED] (.2); correspondence with C. Hagen re [REDACTED] (.1)	0.40	300.00	120.00
02/06/2024	PDW Pamela Weiss	Prepare for deposition of Dean Morton as 30b6 (.3); attend deposition of Dean Morton (1.9); email correspondence to Dean Morton [REDACTED] (.1); review and analyze documents and forward items to Dr. Michel to review for her deposition (.5); analyze scope of potential MSJ (.3); correspondence with C. Hagen and plaintiff counsel re emergency continuation of deposition (.2)	3.30	300.00	990.00
02/08/2024	PDW Pamela Weiss	Correspondence from Dr. Michel re [REDACTED]	0.10	300.00	30.00

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02/09/2024	PDW Pamela Weiss	Deposition preparation with Dr. Michel	2.40	300.00	720.00
02/12/2024	PDW Pamela Weiss	Draft summary and update re depositions to Daisy and Mike	0.30	300.00	90.00
02/13/2024	PDW Pamela Weiss	Correspondence to/from Altman re deposition (.2); review and analyze potential exhibits for Michel's deposition (.2); draft and send email to Dr. Michel re [REDACTED] (.1); phone call with Dr. Michel re [REDACTED] (.8)	1.30	300.00	390.00
02/14/2024	PDW Pamela Weiss	Correspondence from/to Altman re exhibits (.1); prepare for deposition (.2); attend deposition of Dr. Michel (2.1); telephone discussion with Dr. Michel re [REDACTED] (.8)	3.20	300.00	960.00
02/15/2024	PDW Pamela Weiss	Draft and send email to B. Mufale re [REDACTED] (.2); phone call and message to D. Kinley re [REDACTED] (.1)	0.30	300.00	90.00
02/16/2024	PDW Pamela Weiss	Correspondence from/to B. Mufale re [REDACTED] (.2); draft and send email to Daisy and Mike re [REDACTED] (.1)	0.30	300.00	90.00
02/19/2024	PDW Pamela Weiss	Correspondence t/f videographer re transcripts	0.00	0.00	0.00
02/20/2024	PDW Pamela Weiss	Correspondence with court reporter re transcripts (.1); phone call with D. Kinley re [REDACTED] (.2); identify documents [REDACTED] and draft and send email with same (.5); review and analyze transcript of Mason deposition [REDACTED] (1.5)	2.30	300.00	690.00
02/21/2024	PDW Pamela Weiss	Identify documents [REDACTED] and forward to Kinley [REDACTED] (.5); outline subjects to discuss at deposition preparation with Kinley (.2); correspondence with Altman re upcoming depositions (.1)	0.80	300.00	240.00
02/23/2024	PDW Pamela Weiss	Telephone discussion with D. Kinley [REDACTED]	2.00	300.00	600.00
02/26/2024	PDW Pamela Weiss	Zoom meeting with B. Mufale [REDACTED] (1.8); receive and review proposed exhibits from plaintiff and forward to witnesses (.2)	2.00	300.00	600.00
02/27/2024	PDW Pamela Weiss	Prepare for depositions (.2); attend and defend deposition of D. Kinley (2.1); attend and defend deposition of B. Mufale (2.0)	4.30	300.00	1,290.00
02/29/2024	PDW Pamela Weiss	Draft summary to Daisy Saffir and Mike Kenna re [REDACTED]	0.60	300.00	180.00
03/01/2024	PDW Pamela Weiss	Correspondence to/from Carla Hagen re [REDACTED]	0.10	300.00	30.00
03/04/2024	PDW Pamela Weiss	Email correspondence to/from Carla Hagen re [REDACTED] (.2); multiple email correspondence to Altman re Hagen's deposition (.2); review and analyze re-notice for Hagen [REDACTED] (.2)	0.60	300.00	180.00
03/08/2024	PDW Pamela Weiss	Telephonic discussion with Carla Hagen re [REDACTED]	1.40	300.00	420.00

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03/11/2024	PDW Pamela Weiss	Correspondence to/from court reporter and to Carla Hagen re deposition (.1); email correspondence with Carl Hagen re [REDACTED] (.2)	0.30	300.00	90.00
03/12/2024	PDW Pamela Weiss	Review and analyze exhibits for deposition sent by Altman (.3); attend and defend deposition of C. Hagen (2.2); [REDACTED] discussion with C. Hagen re [REDACTED] (1.2)	3.70	300.00	1,110.00
03/13/2024	PDW Pamela Weiss	Prepare supplement disclosure of handbook (.2); correspondence with Daisy re [REDACTED] d [REDACTED] (.4)	0.60	300.00	180.00
04/23/2024	PDW Pamela Weiss	Review, review and analyze late-filed Errata from plaintiff (.7); draft and send email to D. Kinley [REDACTED] (.2); draft and send email to C. Michel re [REDACTED] (2); Draft and send email t D. Saffir and M. Kenna re [REDACTED] (.6)	1.70	300.00	510.00
04/24/2024	PDW Pamela Weiss	Correspondence f/t Dr. Michel re e [REDACTED]	0.10	300.00	30.00
05/06/2024	PDW Pamela Weiss	Review and analyze email from C. Michel re [REDACTED] (.2); draft and send email to C. Michel re [REDACTED] (.1)	0.30	300.00	90.00
06/03/2024	PDW Pamela Weiss	Review and analyze Mason deposition transcripts to identify portions for use in Motion for summary judgment (1.3); prepare detailed outline of Motion for summary judgment (2.4)	3.70	300.00	1,110.00
06/06/2024	PDW Pamela Weiss	Work on Standard of Review and discussion regarding statute of limitations for MSJ	0.90	300.00	270.00
06/11/2024	PDW Pamela Weiss	Evaluate [REDACTED]	2.20	300.00	660.00
06/12/2024	PDW Pamela Weiss	Work on background section of Motion for summary judgment (3.0); evaluate and analyze potential materials [REDACTED] (.7); begin work on argument section (.2)	3.90	300.00	1,170.00
06/13/2024	PDW Pamela Weiss	Revise and supplement background section (.9); review and revise discussion re Statute of Limitations (.7); evaluate contract claim and outline portion of Motion for Summary Judgment re same (1.6); supplement background regarding ADA and testing issues (2.0)	5.20	300.00	1,560.00
06/14/2024	PDW Pamela Weiss	Review and supplement background section of Motion for summary judgment [REDACTED]	2.10	300.00	630.00
06/16/2024	PDW Pamela Weiss	Work on consolidation of statement of facts in Motion for Summary Judgment	0.70	300.00	210.00
06/17/2024	PDW Pamela Weiss	Review and analyze 30b6 depositions [REDACTED] (.7); review and analyze depositions of individuals to identify relevant citations (1.1); work on argument portion of summary judgment motion (5.1)	6.80	300.00	2,040.00
06/18/2024	PDW Pamela Weiss	Review and revise Standard of Review section of Motion	0.40	300.00	120.00

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06/19/2024	PDW Pamela Weiss	Review and revise Motion for summary judgment argument on civil rights claims (1.3); work on damages discussion (1.2); evaluate [REDACTED] (1.0)	3.50	300.00	1,050.00
06/20/2024	PDW Pamela Weiss	Continue work on motion to add citations to exhibits, and depositions (2.1); review and revise qualified immunity discussion (.8); review and revise argument section (1.4)	4.30	300.00	1,290.00
06/26/2024	PDW Pamela Weiss	Review, revise and supplement argument section of Motion for Summary Judgment (4.2); review and analyze Complaint [REDACTED] (1.8)	6.50	300.00	1,950.00
06/27/2024	PDW Pamela Weiss	Revise and supplement damages section of Motion for summary judgment (2.8); draft and send email to Daisy and Mike re [REDACTED] (.1)	2.90	300.00	870.00
06/30/2024	PDW Pamela Weiss	Research re [REDACTED] (.3); supplement standard regarding qualified immunity (.5); revise and restructure argument re damages (1.5); line edit of Motion for Summary Judgment and cite check against exhibits and cases (5.4)	7.40	300.00	2,220.00
07/01/2024	PDW Pamela Weiss	Final revisions to Motion for summary judgment before filing	0.70	300.00	210.00
07/23/2024	KEC Kristin E. Crabb	Discuss [REDACTED]	0.30	300.00	90.00
07/23/2024	PDW Pamela Weiss	Cursory review of Opposition (.2); evaluate [REDACTED] (.2); draft and send email to Daisy and Mike re [REDACTED] (.2)	0.60	300.00	180.00
07/30/2024	PDW Pamela Weiss	Review and analyze Material Facts in opposition [REDACTED], research re [REDACTED] and begin drafting fact section of Reply	3.80	300.00	1,140.00
07/31/2024	PDW Pamela Weiss	Work on drafting Reply	2.00	300.00	600.00
08/01/2024	PDW Pamela Weiss	Work on reply in support of MSJ	4.20	300.00	1,260.00
08/02/2024	PDW Pamela Weiss	Review and revise Reply (.6); email to Daisy and Mike [REDACTED] (.1)	0.70	300.00	210.00
10/10/2024	PDW Pamela Weiss	Correspondence from/to C. Michel re [REDACTED]	0.20	300.00	60.00
<b>Totals:</b>			<b>224.10</b>		<b>67,215.00</b>
<b>Expenses</b>					
04/30/2023	069	Westlaw on-line legal research	307.14	1.00	307.14
09/30/2023	069	Westlaw on-line legal research	19.90	1.00	19.90
06/28/2024	069	Westlaw.	0.00	1.00	0.00

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			<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
08/30/2024	069	Westlaw.	24.26	1.00	24.26
			<b>Totals:</b>	<b>351.30</b>	<b>351.30</b>
			<b>Report Totals:</b>		<b>67,566.30</b>